

12 DEC 1975

MEMORANDUM FOR: Director, Equal Employment Opportunity
THROUGH : Deputy Director for Administration
SUBJECT : Table of Organization for the Office of Equal Employment Opportunity
REFERENCES : a. Memo for D/Pers fr Admin Officer, DCI dtd 30 Oct 75, same subj.
b. Memo for Admin Officer, DCI fr D/Pers dtd 7 Oct 75, same subj.

1. In response to Reference a, and pursuant to our recent discussions with you regarding the grade levels of the positions that have been proposed for the Office of Equal Employment Opportunity, we have completed a review of the information and material relating to your current and projected functions.
2. The Position Management and Compensation Division, Office of Personnel conducted comparative reviews of established EEO programs and positions in 12 other Federal agencies and departments and found a general pattern of allocations that provided for a GS-15 Program or Office Director, a GS-14 Deputy, and GS-13 Specialists. In most instances, and in all cases that exceeded the general grade pattern, the programs encompassed larger employee populations than that which exists in CIA and included responsibility for monitoring Equal Employment standards practiced by companies doing contract work for their agencies. The initial allocations proposed by PMCD for the two top positions in O/EEO exceed this general pattern in recognition of the added planning and management responsibilities required in the establishment and development of a new program. The remaining positions in O/EEO were proposed for allocation on the basis of their prospective functions as outlined by you, in comparison with similar level functions in other positions in CIA and in other agencies.
3. In discussions with representatives of the Office of Personnel, you outlined additional functions to be performed by several of the employees who will be occupying positions in O/EEO. These additional responsibilities have been considered in the PMCD evaluations and are reflected in increased grade allocations for two of the positions in question (i.e., the EEO Specialist - GS-12 to GS-13, and EEO Assistant - GS-07 to GS-09). In discussing the four senior positions, you presented several points for consideration:

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a. The responsibilities of members of the EEO Staff should be equated to those performed by members of the Inspector General's Staff.

b. Aside from the grade allocations related to position functions and responsibilities, additional consideration should be given to senior O/EEO positions to insure sufficient prestige in dealing with Agency managers.

c. The Director, EEO should be allocated at least at the level of a Deputy Office Head within one of the Directorates.

d. The closest comparisons with CIA, in terms of EEO programs, appear to be found in the State Department and the National Security Agency which indicate a higher graded structure than that proposed by PMCD.

e. The position grades of the O/EEO should be sufficiently high to accommodate the grade levels of currently assigned personnel and those selected and pending assignment, with headroom for future promotion in their own positions.

4. Upon reviewing these additional points, PMCD was unable to justify additional credit based upon the rationale presented.

a. Direct comparison with the IG Staff's responsibilities reveal differences in terms of the scope of the IG functions and the knowledge and experiences required to perform them. The EEO function, albeit an important function, is concerned with various aspects of personnel management, which represents one of many different programs in the Agency. Although the O/EEO Staff must be knowledgeable of the different facets of personnel management to perform their functions, the IG Staff members must be knowledgeable of, and have responsibility for, examining Agency components and their total programs, encompassing personnel management as one of the many factors to be considered.

b. The prestige factor associated with a position is clearly related to the degree of top management support for the activity, rather than the grade or title of the position involved.

c. The GS-17 levels allotted to many of the Deputy Office Heads of the various Agency Directorates are based upon their shared responsibility for managing a major functional segment of the Agency. The strength of such grade allocations rests upon the managerial responsibility relating to the size, scope and complexity of programs within an assigned area.

d. PMCD has made additional inquiries concerning the grade structures for the positions in EEO elements in both DoD and NSA. On 17 November 1975 an inquiry to NSA reconfirmed previous information

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that the Director of their EEO program occupies a position evaluated and allocated at the GS-15 level. Additional information from the Department of Defense showed little relationship between the responsibilities and scope of their EEO positions and those in CIA. Within DoD there is a GS-18 Deputy Assistant Secretary (EEO) who has responsibility for the EEO program encompassing the several million military and civilian personnel of DoD. The Division Chief under him, with EEO responsibility for all of DoD's 1,036,000 civilian employees, is a GS-16.

e. Some reference should be made to the State Department's EEO structure also. The FSO-1 Officer assigned to direct their EEO program has other substantive roles and has EEO responsibilities largely in title only. A close parallel in the Agency would be the appointment of one of the Deputy Directors as the EEO focal point. The functioning Director of the State Department's EEO program is the Deputy, allocated at the FSO-2 (GS-16/17) level. Their program includes responsibilities for monitoring contractor EEO compliance and covers an employee population larger than the Agency's.

f. The Office of Personnel's objective in the adjudication of position grade levels is to arrive at its conclusions on the basis of objective comparisons with comparable positions in other agencies, equitable comparisons with similar level functions within the Agency, consideration of the substantive elements of the proposed position itself, and where pertinent, the qualifications and experience of the incumbent as related to the specific job requirement. Any "headroom" as regards the grade of a position vis-a-vis the grade of the incumbent is the result of judgments based on the factors cited above.

5. After reevaluation of the information available concerning the structure of the Office of Equal Employment Opportunity, the Office of Personnel has amended the initially proposed position structure (Reference b) to include allocations at higher grade levels for two of the positions. This initial structure will accommodate the grade levels of your currently assigned personnel and those whom you indicated were pending assignment. However, we believe that all positions should be annotated for subsequent review in six months to reevaluate the functions actually being performed and the appropriateness of the grade allocations. The adjusted position structure which we have developed for O/EEO is as follows:

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<u>Position Title</u>	<u>Position Grade</u>	<u>Incumbent</u>
D/EEO	GS-16	?
DD/EEO & FWPC	GS-15	
Asst to D/EEO	GS-14	15
EEO Specialist	GS-13	
EEO Specialist	GS-13	TDY
EEO Assistant	GS-09	
Secretary	GS-07	

O. Ware, GS-16

STAT

[Redacted]
F. W. M. Janney
Director of Personnel

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 SECRET

ROUTING AND RECORD SHEET

SUBJECT: (Optional)

Table of Organization for the Office of Equal Employment Opportunity

FROM:	Director of Personnel 5 E 58, Hqs.	EXTENSION	NO.	DATE	STAT
				RECEIVED	
TO: (Officer designation, room number, and building)				COMMENTS (Number each comment to show from whom to whom. Draw a line across column after each comment.)	
1. Deputy Director for Administration		18 DEC 1975	SB	<p>To 5</p> <p>Omega,</p> <p>It is my strong suggestion that this recommended T/O be accepted at this time, and reviewed in six months, per Para 5.</p> <p>I am forwarding a copy of this to the Director.</p>	
2.	7 D 26, Hqs.				
3.					
4.					
5. Director, Equal Employment Opportunity					
6. 4-E-32	2-E-54, Hqs.				
7.					
To 5:					
Omega:					
It is my strong suggestion that this recommended T/O be accepted at this time, and reviewed in six months, per Para 5. I am forwarding a copy of this to the Director.					
/s/ Jack Blake					
12.					
13.					
14.					
15.					